

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA**

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447 CI-011

HEATHER CLEM; GAWKER MEDIA, LLC  
AKA GAWKER MEDIA; GAWKER MEDIA  
GROUP, INC. AKA GAWKER MEDIA;  
GAWKER ENTERTAINMENT, LLC;  
GAWKER TECHNOLOGY, LLC; GAWKER  
SALES, LLC; NICK DENTON; A.J.  
DAULERIO; KATE BENNERT, AND  
BLOGWIRE HUNGARY SZELLEMI  
ALKOTAST HASZNOSITO KFT AKA  
GAWKER MEDIA,

Defendants.

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**NOTICE OF TAKING VIDEOTAPED DEPOSITION  
OF CORPORATE REPRESENTATIVE OF GAWKER MEDIA, LLC**

TO:

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Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan (“Bollea”), will take the deposition by oral examination of the person or persons designated by Gawker Media, LLC (“Gawker”), at the time and location indicated:

**Deponent:** Corporate Representative of Gawker Media, LLC  
**Date and Time:** March 6, 2015 at 10:00 a.m.  
**Location:** Merrill Corporation, 1345 Avenue of the Americas, 17th Floor  
New York, NY 10105

This deposition is being taken by oral examination before a member of Merrill Corporation, or a Notary Public in and for the State of New York at Large, and or some other officer duly authorized by law to take depositions.

Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, Gawker shall designate one or more of its officers, directors or managing agents or other persons with the most knowledge to give testimony regarding the issues specified in Schedule "A" attached hereto. The deposition is being taken for the purpose of discovery, for use at trial, and for all other purposes that are permitted under the Florida Rules of Civil Procedure.

The deposition shall continue from day to day until completed. The deposition will be recorded by video by a videographer provided by Merrill Corporation, 1345 Avenue of the Americas, 17<sup>th</sup> Floor, New York, NY 10105, and/or using instant visual display of the testimony (e.g., Live Note), as well as stenographically.

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

DATED on December 29, 2014.

*/s/ Kenneth G. Turkel*  
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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 29th day of December, 2014 to the following:

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